

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL  
LEAGUE PLAYERS' CONCUSSION  
INJURY LITIGATION

No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

Plaintiffs' Master Administrative Long-  
Form Complaint and:

Robert Massey, et al. v. National Football  
League, et al.

Court File No. 2:12-cv-6069-AB

**MOTION FOR LEAVE TO  
WITHDRAW AS COUNSEL  
FOR PLAINTIFF TOUSSAINT  
TYLER**

Charles S. Zimmerman, J. Gordon Rudd, Jr., and Brian C. Gudmundson of Zimmerman Reed LLP ("Plaintiffs' Counsel"), move this Court pursuant to Pennsylvania Rule of Professional Conduct 1.16(b)(1) and United States District Court for the Eastern District of Pennsylvania Local Rule of Civil Procedure 5.1(c) to withdraw as counsel in relation to the claims of Toussaint Tyler only in this action, and state as follows:

1. Plaintiffs' counsel filed the action *Robert Massey, et al. v. National Football League, et al.*, No. 2:12-cv-6069-AB, in the Eastern District of Pennsylvania on September 27, 2012, for the benefit of several retired National Football League players, including Toussaint Tyler.

2. Plaintiffs' counsel filed a short form complaint for Toussaint Tyler on October 29, 2012.

3. Since then, irreconcilable differences have arisen between Plaintiff Toussaint Tyler and the undersigned.

4. Plaintiffs' counsel properly notified Toussaint Tyler of counsel's intention to withdraw from representing him in this matter.

5. Under the circumstances, it is apparent that the undersigned must move the Court for leave to withdraw as counsel.

WHEREFORE, Plaintiffs' counsel respectfully requests this Court for leave to withdraw as counsel for Toussaint Tyler only in Court File No. 2:12-cv-6069-AB.

Dated: February 9, 2017

Respectfully submitted,

ZIMMERMAN REED LLP

s/ Charles S. Zimmerman

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